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12 NEVADA, LLC; LENNAR SALES CORP.
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15 UNITED STATES DISTRICT COURT
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17 DISTRICT OF NEVADA

18 PETER J. HELLMAN,

19 CASE NO.: 2:20-cv-00559-JCM-BNW

20 Plaintiff,

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22 STIPULATION AND [PROPOSED]
23 ORDER TO EXTEND DISCOVERY
24 DEADLINES

25 vs.

26 GREYSTONE NEVADA, LLC.;
27 LENNAR SALES CORP.; DOES 1
28 through X; and ROE CORPORATIONS
XI through XXXI, inclusive,

Defendants.

1 Defendants GREYSTONE NEVADA, LLC and LENNAR SALES CORP.
2 ("Greystone"), by and through their counsel of record, Amtoj Randhawa, Esq. of
3 Newmeyer & Dillion LLP, and Plaintiff PETER J. HELLMAN, by and through his counsel
4 of record, John B. Greene, Esq. of Vannah & Vannah, HEREBY STIPULATE pursuant to
5 LR IA 6-1, and request the Court to extend all remaining discovery deadlines by 120 days,
6 as set forth herein.

7 These extensions are requested in light of the difficulties the parties have faced in
8 conducting discovery given the ongoing COVID-19 pandemic and the business and
9 administrative disruptions caused by same.

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1 The parties hereby stipulate and request to continue the dates set forth in the Court's
2 Scheduling Order (ECF 9) as follows:

3 1. That the Discovery Cut-off be extended from December 28, 2020 to April
4 27, 2021;

5 2. That the time for parties to file any motions to amend the pleadings to add
6 parties be extended from September 28, 2020 to January 26, 2021.

7 3. That the Disclosure of experts and their reports shall be extended from
8 October 28, 2020 to February 25, 2021. The disclosure of rebuttal experts and their
9 reports shall be extended from November 27, 2020 to March 29, 2021.

10 4. That the interim status report shall be extended from October 28, 2020 to
11 February 25, 2021.

12 5. That the time for parties to file Dispositive Motions shall be extended from
13 January 27, 2021 to May 27, 2021.

14 6. That the time for parties to prepare a Consolidated Pre-Trial Order shall be
15 extended from February 28, 2021 to June 25, 2021.

16 7. That the time for parties to stipulate or move to extend the discovery cutoff
17 be extended from December 4, 2020 to April 6, 2021.

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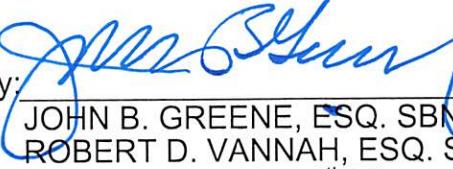
1 Dated: this 8th day of September, 2020 NEWMEYER & DILLION LLP

2 By: 
3

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10 Dated: this 8 day of September, 2020 VANNAH & VANNAH

11 By: 
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17 Attorneys for Plaintiff PETER J. HELLMAN

18 ORDER

19 The parties' stipulation is GRANTED in part and DENIED in part. The Court will
20 grant the parties an additional 60 days of discovery, rather than 120 days. The
21 Court is happy to consider additional extensions if the parties cannot safely
22 complete discovery within the extended period. However, if the parties again move
23 or stipulate to extend discovery, the parties should endeavor to provide a more
24 detailed explanation about why discovery cannot be completed within the extend
25 period.

26 IT IS SO ORDERED:

27 Date: September 10th, 2020 
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29 UNITED STATES DISTRICT JUDGE